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PARKER CHAPIN FLATTAU & KLIMPL
COUNSELLORS AT LAW

1211 AVENUE OF THE AMERICAS
NEW YORK, NY 10036

(212) 704-6000

CABLE LAWPAK

TELECOPIER (212) 704-6288

TELEX 640347



SDMS DocID 000217207

PATRICIA L. TRUSCELLI
(212) 704-6315

SHPACK
11.9
SWANK
100 JERICO QUADRANGLE
JERICO, NY 11753
(516) 932-6500
TELECOPIER (516) 932-6506

December 6, 1990

Ms. Paula Fitzsimmons
U.S. E.P.A.
Waste Management Division
Region I
JFK Federal Building
Boston, MA 02203

Re: Shpack Superfund Site

Dear Paula:

I enclose herewith amended responses to the information request served upon Swank, Inc. in January of this year. The amendment is made pursuant to the requirements of §104 and reflects additional information obtained subsequent to our original filing.

Please contact me directly if you have any questions in connection with this matter.

Very truly yours,

Pat Truscelli

Patricia L. Truscelli

PLT:nl
Enclosure



November 30, 1990

Merrill S. Hohman, Director
Waste Management Division
United States Environmental Protection Agency
Region 1
J.F. Kennedy Federal Building
Boston, Massachusetts 02203-2211

Dear Sir:

The following are amended responses to the Information Request provided to Swank Incorporated on January 12, 1990, pursuant to Section 104 of CERCLA for Shpack Landfill Superfund Site in Norton and Attleboro, Massachusetts:

1. Raymond J. Hill, Senior Vice-President/Operations
David H. Miller, Vice-President/Quality Control and
Environmental Affairs
2. The following personnel were consulted in the preparation of these responses. Where a specific individual provided significant input with respect to a given response, his name is noted.

Mr. Raymond J. Hill, Senior Vice-President/Operations
Mr. Robert Best, Director/Purchasing (Retired)
Mr. James Hall, Director/Purchasing (Current)
Mr. Donald Coelho, Supervisor/Maintenance (Current)
Mr. Edward Fuller, Supervisor/Maintenance (Retired)
Mr. Larry Governo, Maintenance Worker (Retired)
Mr. Gordon Buckley, Maintenance Worker (Current)
3. Due to the length of time which has passed since the period in question, no written documentation is available other than materials previously provided. Additional information which forms the basis for the answers here provided was obtained from interviews with individuals pertaining to events which occurred during the relevant time period.
4. EPA Identification # MAD 001202340
5. Swank has extremely limited information pertaining to the operations of the Shpack site. Presumably, responsibility for releases at the site rests with the owner/operators.
 - a. Swank was not in a position to take precautions against the acts of third parties concerning the operations at the site.

b. Swank was not an owner or operator of the site, and therefore had neither the obligation nor the ability to control the care of wastes disposed of at the site. At all relevant times it was the understanding of Swank's employees that waste disposed of at the Shpack site was handled in an appropriate and lawful manner.

6. Current or former owner/operators of the Site.

7. Mr. Ed Fuller, Mr. Larry Governo, Mr. Donald Coelho, and Mr. Gordon Buckley, as listed above.

8. No response required.

9. In addition to Swank, Incorporated, and the other parties already identified as potential users of the site, employees (Mr. Governo Mr. Coelho) recall seeing vehicles and employees of the following companies delivering waste to the site: L.G. Balfour Company, The Robbins Company and Leavens Awards Company, Inc.

The responses below relate only to the activities of Swank, Incorporated:

a. The owner of the site at the time in question, Mr. Isadore Shpack.

b. No specific arrangements for hazardous materials were made for disposal at the Shpack dump site. However, during a period of time estimated to be three to six months during 1955, Swank Incorporated did utilize this site for the disposal of general refuse.

c. During the time period in question, Swank, Incorporated operated four degreasers, three "small" ones and one "large" one. The "large" unit was a Detrex Model 1DCR-750-1S, size R-1, which is still on-site, but not in service; one of the "small" units was a Mechanical Process Company open top unit with an approximate capacity of one hundred gallons, which is still in use. The other two "small" units were removed several years ago and no identification is available. It was routine practice to clean out one of the small degreasers per week, and dispose of any accumulated sludge or "still bottoms" in the trash. This amounted to an estimated one gallon of sludge per week in total. The large unit was shut down and cleaned out on an annual basis. It is not believed that this unit was cleaned out during the time period in question.

The material which may have been disposed of included "still bottoms" consisting of a mixture of trichloroethylene (CAS # 79016) and oil and/or polishing compound solids (waxes, animal fats, and abrasives). The total volume was approximately one gallon of sludge per week for an estimated twenty weeks. [Gordon Buckley]

Recent analyses by the solvent recycler currently handling similar still bottoms shows them to average approximately forty-eight per cent trichloroethylene.

d. The material shipped to the site consisted of approximately six cubic yards of general trash (paper, boxes, etc.) daily for each day of operation of the facility (five days per week). [Donald Coelho]

e. The owner of the material was Swank, Incorporated.

f. No testing was performed on any of the materials sent. (The still bottoms which may have been included with the general trash were not considered hazardous material at the time; therefore, no specific testing was required).

g. The precise locations are unknown. General trash was deposited in various locations at the direction of the site owner/manager. [Mr. Larry Governol].

h. Truck driver disposed of trash as directed by the site owner/manager. [Mr. Larry Governol].

i. Site was selected by the Supervisor of Maintenance responsible for trash removal, Mr. Ed Fuller.

j. No fees were paid for trash disposal.

k. The material in question was not considered hazardous at the time of disposal. Therefore, no special arrangements were deemed necessary, nor were any made.

l. None. Material was shipped directly from Swank plant site to the Shpack site in a company-owned truck.

m. Unknown.

n. Unknown.

o. No measures were taken since the materials disposed of were not classified hazardous at the time of disposal.

p. No special containers or markings were used since the material was not considered hazardous or known to be regulated. The material would have been mixed in with other normal trash.

The information requested in Questions 10-16 have been previously provided under separate cover.

Sincerely:

A handwritten signature in cursive script, appearing to read "David H. Miller". The signature is written in dark ink and is positioned to the right of the word "Sincerely:".

David H. Miller